



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

DATE: April 14, 2011

TO: Pat Modugno, Chair
Esther L. Valadez, Vice Chair
David W. Louie, Commissioner
Harold V. Helsley, Commissioner
Curt Pedersen, Commissioner

FROM: Samuel Z. Dea, Supervising Regional Planner
Special Projects Section

**SUBJECT: AGENDA ITEM NO. 6
PROJECT NUMBER TR070853-(2)**

The following additional documents are provided for your Commission's information:

- Revised California Environmental Quality Act (CEQA) Findings. Minor changes were made to the CEQA Findings which were limited to editorial refinements and localized modifications to the language that add clarity to the document. Only the CEQA Findings pages with track changes to the content of the document are included for the Commission's convenience. Track changes made to the cover page, the Table of Contents, and the footers are not included as they are primarily limited to document formatting.
- Correspondence from the applicant regarding the above-referenced item. The letter responds to some of the concerns raised at the community meeting held at the Del Aire County Park on March 26, 2011, such as on-street parking, impacts to existing water system, and lack of demand for housing. In addition, letter addresses community amenities proposed by the applicant such as a restricted parking program, funding for additional street improvements, landscaping enhancements, among others.

If you need further information, please contact Carolina Blengini from my staff at (213) 974-1522 or cblengini@planning.lacounty.gov. Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

Prepared by Carolina Santoro Blengini, Regional Planning Assistant II
Reviewed by Samuel Z. Dea, Supervising Regional Planner

ATTACHMENTS

CEQA Findings

Applicant's Letter dated 4/14/11

SZD:CSB

4/14/11

alternatives to the proposed Project, including: Alternative 1: No Project/No Development, Alternative 2: Existing General Plan and Zoning, Alternative 3: Reduced Scale/Reduced Density, and Alternative 4: No Subterranean Parking. Potential environmental impacts of each of these alternatives were discussed at the CEQA-prescribed level of detail and comparisons were made to the proposed Project.

After conducting its own internal departmental review and analysis of the proposed Project through the screencheck process, the Draft EIR was submitted to the State Clearinghouse/Governor's Office of Planning and Research, and was circulated for a 45-day public review period extending from January 11, 2011 through February 24, 2011. The Notice of Public Hearing and Notice of Completion and Availability of the Draft EIR were published in the Daily Breeze and La Opinion newspapers, and a public hearing notice was sent to property owners within a 500-foot radius of the proposed Project site and to known interested individuals and organizations. The public hearing notice was also posted at the Project site. The Draft EIR and the technical appendices were made available on the County's website at <http://planning.lacounty.gov/case/view/tr070853/> and at the libraries listed below:

Hawthorne Library
12700 Grevillea Ave.
Hawthorne, CA 90250

Lennox Library
4359 Lennox Blvd.
Lennox, CA 90304

Wiseburn Library
5335 West 135th St.
Hawthorne, CA 90250

Copies of the DEIR were also available for public review Monday through Thursday, 7:30 a.m. to 5:30 p.m. at: Los Angeles County Department of Regional Planning, Impact Analysis Section, Room 1348; 320 West Temple Street; Los Angeles, CA 90012.

The Commission conducted a public hearing on the Project on Wednesday, February 16, 2011, at 9:00 a.m. in the Regional Planning Commission Hearing Room, 320 West Temple Street, Los Angeles, CA 90012, and heard a presentation by Staff and the Project Applicant. After public testimony was received from eight members of the public, the Commission recommended that a community meeting be held and then continued the public hearing to April 20, 2011.

A community meeting was held on March 26, 2011 at the Del Aire Park, 12601 South Isis Avenue, Hawthorne, CA 90251. In response to community concerns regarding potential Project-related trips using Judah Avenue to access the Project site, additional optional Project features have been proposed. These optional features are not required to mitigate potential Project-related traffic impacts that were included in the Draft EIR to be less than significant with implementation of proposed Project mitigation measures ("MMs"). Therefore, these optional Project features are proposed to allow for the possibility of future implementation, if determined to be warranted/beneficial by the County. The following three optional traffic calming features are proposed: (1) right-turn egress only from the West 117th Street driveway, with all Project ingress from the Aviation Boulevard driveway; (2) curb extension to prohibit entrance onto West 117th Street from Judah Avenue; and (3) creation of landscaped medians on Judah Avenue between West 118th Street and West 120th Street.

The April 2011 Final EIR, which contains written responses to comments received during the noticed comment period, was completed and submitted to the State Clearinghouse/Governor's Office of Planning and Research, and distributed on April 7, 2011. Distribution of the Final EIR entailed providing copies of the Final EIR to public agencies and organizations that commented on the Draft EIR, and notifying individuals who commented on the Draft EIR of the Final EIR availability. The Final EIR was made available to the public on the County's website, at the Los Angeles County Department of Regional Planning, and at three public libraries located in the vicinity of the Project area. The Final EIR was prepared and distributed in accordance with

- (d) Inadequate Fire Flows and Pressures (Less than Significant Impact with Mitigation)
- (e) Proximity to Fire Hazards (Less than Significant Impact with Mitigation)
- (f) Potential Fire Hazard (Less than Significant Impact with Mitigation)

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

Facts Supporting the Finding

The Draft EIR analyzed potential impacts regarding fire hazards in Section 3.3 of the Draft EIR, which is incorporated by reference herein.

(a) Very High Fire Hazard Severity Zone, (b) Location in Fire Hazard Area Served by Inadequate Access, (c) Location in Fire Hazard Area with More than 75 Units on Single Access. The Project site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) designated by the County. The Project site and Caltrans Off-Site Project Area currently have adequate access for fire protection. The Project, including Caltrans Off-Site Project Area improvements, would comply with all applicable *County of Los Angeles Code* and Ordinance requirements regarding fire prevention and suppression measures, including, but not limited to, construction materials, building access and evacuation routes, automatic fire-extinguishing systems, standards for multi-family housing and commercial land uses, site access/Fire Lanes, hydrants, water availability, and fire flows (pressures) (refer to MM 3.3-1). ~~Therefore~~In addition, the Project would not include 75 or more units on a single access, regardless of fire hazard area, and would have adequate access in conformance with LACFD requirements. There would be ~~no~~less than significant impact.

(d) Inadequate Fire Flows and Pressures. The results of a fire flow test conducted by Golden State Water Company in April of 2009 indicated that the existing water system was not adequate for fire flows. In order to ensure the Project receives adequate fire flow pressure, the Project includes the construction of new water and fire protection infrastructure, including water lines, water laterals and fire hydrants, as described in MM 3.3-2. As described in MM 3.3-1, the Project would comply with applicable *County of Los Angeles Code* Title 32 and Ordinance requirements and all LACFD conditions of approval. ~~ThThereThere~~ would be ~~no~~less than significant impact.

(e) Proximity to Fire Hazards, (f) Potential Fire Hazard. There are no manufacturing or industrial land uses adjacent to the Project site, Caltrans Off-Site Project Area, and surrounding areas that could pose potential dangerous fire hazard conditions associated with on-site use or material storage. The Project land uses (i.e. residential, commercial and parking) would not constitute a potentially dangerous fire hazard. ~~There would be a less than significant impact.~~ As described in MM 3.3-1, the Project would comply with applicable *County of Los Angeles Code* Title 32 and Ordinance requirements and all LACFD conditions of approval. There would be a less than significant impact.

There would be no significant impacts related to fire safety with adherence to *County of Los Angeles Code* Title 32 and Ordinance requirements, which would be ensured via the following mitigation measure:

MM 3.3-1 The Project shall comply with all applicable County of Los Angeles Code Title 32 and Ordinance requirements regarding fire prevention and suppression measures, and/or measures approved or required by the Fire Chief, including construction materials, building access and evacuation routes, automatic fire extinguishing systems, standards for multi-family housing and commercial land uses, site access/fire lanes, hydrants water availability, and fire flows and pressures, among other requirements, to the satisfaction of the Los Angeles County Fire Department (LACFD). Prior to issuance of building permits, Project Applicant/Developer shall submit all necessary plans and materials to the LACFD for review and approval.

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In addition, the significant impacts identified in the Draft EIR would be reduced to a less than significant level with implementation of the following mitigation measures:

MM 3.3-2 Prior to issuance of building permits, the Project Applicant/Developer shall demonstrate to the County of Los Angeles Department of Public Works and the Los Angeles County Fire Department (LACFD) that the Project includes appropriate infrastructure to ensure adequate water and fire flow infrastructure and compliance with Los Angeles County Code Title 32 requirements. It is anticipated that segments of the existing four- and six-inch diameter water lines in Aviation Boulevard (between West 116th Street and West 117th Street), 116th Street (between Aviation Boulevard and Judah Avenue), West 117th Street (between Aviation Boulevard and Isis Avenue), and Judah Avenue (between West 117th Street and West 118th Street) shall be abandoned and three existing fire hydrants shall be removed. The Project shall include the following new water and fire flow infrastructure to the satisfaction of LACFD:

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- Twelve-inch diameter water line within West 117th Street between Aviation Boulevard and Isis Avenue turning south at Isis Avenue and immediately connecting with the existing 12-inch water line;
- Eight-inch-diameter water lines within Aviation Boulevard (between West 117th Street and the proposed Fire Lane along the northern property boundary), the proposed Fire Lane (between Aviation Boulevard and Judah Avenue), and Judah Avenue (between the proposed Fire Lane and West 118th Street). These lines will connect with the new 12-inch line in West 117th Street;
- A 6-inch-diameter water lateral from Building 1A to the new water line in West 117th Street, 8-, 6-, and 2-inch-diameter water laterals from the Building 1B to the new water line in Judah Avenue, and from Building 2A to the new water line in the Fire Lane. Building 2B would be served via the laterals extending to Building 2A.
- Six new fire hydrants evenly distributed around the perimeter of the Project site.

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MM 3.3-3 Prior to issuance of building permits for the off-site Project Area, the Project Applicant/Developer shall demonstrate to the County of Los Angeles Department of Public Works that the Project includes adequate water infrastructure. It is anticipated that a new water lateral within the off-site, Caltrans-owned property shall be constructed to provide service to the restrooms and water fountain associated with the new Metro bus terminal. The water line shall be connected to the existing 6-inch-diameter water line within the off-site Caltrans property.

proximity to the Metro Green Line Aviation/LAX Station, which currently operates 24-hours per day, 7 days per week. For these reasons, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport and light rail operations (e.g., noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport and light rail annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

In addition, although not required by the *State Civil Code* (Section 1103 et. seq.), each prospective tenant of leased residential property within the Project shall also be notified as described above.

3.5 WATER QUALITY

Potential Effect

The following summary list of the thresholds were determined to result in either no impact, a less than significant impact, or a less than significant impact after mitigation, as indicated in parentheses following each threshold:

- (a) Water Wells in an Area with Water Quality Problems (No Impact)
- (b) Private Sewage Disposal System (No Impact)
- (c) Degrade Water Quality during Construction (Less than Significant with Mitigation)
- (d) Degrade Water Quality during Operation (Less than Significant with Mitigation)

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

Facts Supporting the Finding

The Draft EIR analyzed potential impacts regarding water quality in Section 4.1 of the Draft EIR, which is incorporated by reference herein.

(a) Water Wells in an Area with Water Quality Problems, (b) Private Sewage Disposal System. The Project would not require the use of individual water wells or require the use of a private sewage disposal system. There would be no impact.

(c) Degrade Water Quality during Construction. Construction activities that involve more than one acre are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board (SWRCB), Division of Water Quality. As required by MM 4.1-1, the Project Applicant/Developer's full compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction Activity is required, including construction of the Caltrans Off-Site Project Area improvements and all off-site Project components. Pursuant to permit requirements, the Project Applicant/Developer shall develop a Permit Registration Document (PRD), including a Storm Water Pollution Prevention Plan, that incorporates BMPs for reducing or eliminating construction-related pollutants in the site runoff, and ongoing monitoring of site runoff water quality. With implementation Therefore, compliance with the requirements

of the ~~stated mitigation measure, impact~~ NPDES Construction General Permit, per MM 4.1-1, and the Los Angeles County Code Chapter 12.80, would ~~be reduced short term,~~ construction related water quality impacts to a less than significant level.

(d) Degrade Water Quality during Operation. The Project involves the construction of residential and commercial land uses (the same as current land uses), which would not be a substantive source of the 303(d) listed pollutants for Dominguez Channel, which are remnants of historically commonly used pollutants (i.e. DDT, Lead), or are generated by industrial and/or manufacturing land uses. Proposed residential land uses could contribute to the generation of Coliform Bacteria and/or Indicator Bacteria through an increase in on-site domestic pets (specifically dogs). In order to ensure that animal waste is disposed properly, MM 4.1-2 requires that educational pamphlets are provided to each property-owner and renter. Therefore, with implementation of MM 4.1-2, the Project would not exacerbate the 303(d) listing for Coliform Bacteria and/or Indicator Bacteria. ~~With implementation of the stated mitigation measure, impact would be less than significant.~~

~~Pursuant~~ Also, pursuant to LARWQCB NPDES Permit and Waste Discharge Requirements, the County is required to prohibit the discharge of pollutants from private property developments by requiring the installation and maintenance of post-construction treatment control BMPs. The Los Angeles County SUSMP addresses storm water pollution from new construction and redevelopment and contains a list of minimum BMPs that must be employed to infiltrate or treat storm water runoff, control peak flow discharge, and reduce the post-development discharge of pollutants from storm water conveyance systems, and are set forth in MM 4.1-3. Also, given the increased number of residential units and square footage of commercial proposed for the Project site, there is the potential for increased concentrations of the pollutants previously described above. MM 3.2-1 from Section 3.2, Flood, of the Draft EIR, describes the proposed storm water treatment BMPs proposed for the Aviation Station Project, including an underground infiltration system to capture and percolate the total increase in runoff volume (LID volume) from implementation of the Project; catch basin inserts to filter hydrocarbons, heavy metals, sediments, and organics; conveyance of rooftop and podium-level runoff through planter boxes for filtration prior to entering a public storm drain; and storm drain stenciling that states "Warning! Drains to Ocean". ~~With Therefore, with implementation of the stated mitigation measure, impact~~ MMs 4.1-2, 4.1-3, and 3.2-1, there would be less than significant long-term, operation-related water quality impacts.

The significant impacts identified in the Draft EIR would be reduced to a less than significant level with implementation of the following mitigation measures:

- MM 4.1-1** Prior to the issuance of a grading permit, the Project Applicant/Developer shall file a Permit Registration Document (PRD) with the State Water Resources Control Board (SWRCB) in order to obtain coverage under NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities. The PRD shall consist of a Notice of Intent (NOI); Risk Assessment; Site Map; SWPPP; annual fee; and a signed certification statement. Pursuant to permit requirements, the Project Applicant/Developer shall develop and incorporate BMPs for reducing or eliminating construction-related pollutants in the site runoff to the satisfaction of Los Angeles County Department of Public Works.

68U-DP zone, and proposed mixed-use development project, adjacent to the PF zone and transit amenities, would not present a land use compatibility conflict.

(c) Inconsistent with Land Use Criteria (Hillside Management, Significant Ecological Area, Other). The Project site is fully developed with urban land uses within an urban portion of the County and is not located within a Significant Ecological Area (SEA), SEA Buffer, coastal Sensitive Environmental Resource Area (ESHA) or in a hillside management area. [There would be less than significant impact.](#)

(d) Divide an Established Community. The Project would provide a mix of residential and commercial land uses at a scale and density that would provide a transition between the elevated transit facilities to the north and the single-family residential uses to the south. The development of the Project would not divide an established community and impacts would be less than significant.

3.16 POPULATION, HOUSING, EMPLOYMENT, AND RECREATION

Potential Effect

The following summary list of the thresholds were determined to result in either no impact, a less than significant impact, or a less than significant impact after mitigation, as indicated in parentheses following each threshold:

- (a) Cumulatively Exceed Population Projections (Less than Significant Impact)
- (b) Induce Substantial Growth (Less than Significant Impact)
- (c) Displace Housing (Less than Significant Impact)
- (d) Substantial Jobs/Housing Imbalance or Increase Vehicle Miles Traveled (Less than Significant Impact)
- (e) New or Expanded Recreational Facilities (Less than Significant with Mitigation)
- (f) Displace People (Less than Significant Impact)

Finding

Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

Facts Supporting the Finding

The Draft EIR analyzed potential impacts regarding population, housing, employment, and recreation in Section 6.3 of the Draft EIR and ~~written correspondence with an NOP comment letter from~~ the County of Los Angeles Department of Parks and Recreation located ~~(a comment letter)~~ in Appendix A of the Draft EIR, among other sources, which are incorporated by reference herein.

(a) Cumulatively Exceed Population Projections. The Project would result in a projected net increase of 1,117 persons residing on the Project site. When considered in a regional context, the Project would represent approximately 0.32 percent of the Los Angeles County projected population growth between 2010 and 2015, and 0.07 percent of the Los Angeles County projected population growth through the year 2035. The population generated by the Project would be within the SCAG projections for both the County and the Subregion, and impacts would be less than significant.

SECTION 7.0 FINDINGS REGARDING GROWTH-INDUCING IMPACTSGROWTH-INDUCING IMPACTS

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, the Draft EIR examined ways in which the Project could foster economic or population growth, or the construction of additional development, either directly or indirectly, in the surrounding environment. To address this issue, potential growth-inducing effects were examined through analysis of the following questions:

1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Based on assessment of these four questions, in Section 9.3, Growth-Inducing Impacts of the Proposed Action, the Draft EIR concluded that the Project would not result in significant growth-inducing impacts. To summarize:

- As discussed in Section 3.2, Flood, Section 5.1, Traffic/Access, Section 5.2, Sewage Disposal and Section 5.5, Utilities, of the Draft EIR, no major new infrastructure facilities are required to develop this Project, as proposed.
- Although the Project would develop higher density land uses than currently anticipated for the site, the Project would not exceed official (i.e., Southern California Association of Governments [SCAG]) projections for the unincorporated City of Los Angeles subregion (local), County, or regional population projections (refer to Section 6.3, Population, Housing, Employment and Recreation, of the Draft EIR).
- As discussed in Section 5.2, Sewage Disposal, Section 5.3, Education and Section 5.4, Fire/Sheriff, of the Draft EIR, none of the public service agencies consulted during the preparation of this EIR have indicated that this Project would necessitate the immediate expansion of their existing resources in order to maintain desired levels of service.
- During Project construction, a number of design, engineering, and construction-related jobs would be created. This would be a temporary situation, lasting until Project construction is completed. This would be an indirect, growth-inducing effect of the Project. As new residential and retail/commercial uses are developed and occupied, residents and employees of the Project are expected to seek shopping, entertainment, employment, home improvement, auto maintenance and other economic opportunities in the surrounding area, both on site and off site. This would represent an increased demand for such economic goods and services and could, therefore, encourage the creation of new businesses and/or the expansion of existing businesses that address these economic needs. However, the Project is balanced in that it provides not only

SECTION 9.0 CEQA GUIDELINES SECTIONS 15091 AND 15092

Based on the foregoing Findings and the information contained in the administrative record, the Commission has made one or more of the following findings with respect to each of the significant effects of the Project:

- 1) Changes or alterations have been required in, or incorporated into, the project which ~~mitigate or~~ avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be, adopted by such other agency.
- 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Based on the foregoing Findings and the information contained in the administrative record, and as conditioned by the foregoing:

- 1) All significant effects on the environment due to the Project have been eliminated or substantially lessened where feasible.
- 2) Any remaining significant effects that have been found to be unavoidable are acceptable due to the overriding considerations set forth in Section 16, Statement of Overriding Considerations, of this document.

SECTION 10.0
CEQA GUIDELINES SECTION 15084(d)(3)

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The County has relied on CEQA Guidelines Section 15084(d)(3), which allows acceptance of working drafts prepared by the Project Applicant, a consultant retained by the Project Applicant, or any other person. The County has reviewed and edited as necessary the submitted drafts of the CEQA documentation for the Project to reflect the County's own independent judgment, including reliance on County technical personnel from other departments.

SECTION 11.0
CEQA SECTION 21082.1(c)

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Pursuant to CEQA Section 21082.1(c), the Commission hereby finds that the lead agency (County) has independently reviewed and analyzed the Final EIR, and that the Final EIR reflects the independent judgment of the lead agency.

MITIGATION MONITORING AND REPORTING PROGRAM (Continued)

Mitigation Measures	Action Required	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
MM 4.3-2 A qualified Paleontologist shall be retained to monitor earth-moving activities of 15 feet or deeper (i.e. the depths at which significant vertebrate fossils have been recovered from older Quaternary Alluvium). Should paleontological resources be encountered during earth-moving activities (i.e., grading and excavation), the Paleontologist shall implement procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the resources, as appropriate. If the resources are found to be significant, the Paleontologist shall determine appropriate actions for preservation and/or data recovery to the satisfaction of the Los Angeles County Department of Regional Planning. If the Paleontologist determines that the sediments are not sensitive for the presence of resources, monitoring efforts can be terminated.	Paleontological monitoring and Maintain log demonstrating compliance JJ□□Site Site inspection	During excavation activities of 15 feet or deeper	Project Applicant, Construction Contractor, and Qualified Paleontologist	YQs Angeles County Department of Regional Planning
MM 4.3-3 In accordance with <i>California Health and Safety Code</i> , Section 7050.5, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. The County Coroner shall be notified within 24 hours of the discovery and shall make such determination within 2 working days of notification of discovery. If the County Coroner determines that the remains are or believed to be Native American, the County Coroner shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with <i>California Public Resources Code</i> , Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descended from the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.	Stop work and contact County Coroner	During construction	Project Applicant and Construction Contractor	Los Angeles County Department of Regional Planning



Cox, Castle & Nicholson LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067-3284
P 310.277.4222 F 310.277.7889

Charles J. Moore
310.284.2286
cmoore@coxcastle.com

April 14, 2011

File No. 56290

BY HAND DELIVERY

Regional Planning Commission
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Re: **Transit-Oriented Development at the Metro Green Line Aviation Station;
Regional Planning Commission Hearing Date: April 20, 2011**

Dear Commissioners:

Aviation Station is a vital transit-oriented project that will transform the isolated Metro Green Line LAX/Aviation Station, which features an inadequate bus terminal, to a dynamic and convenient center where the community can live, shop, and, most importantly, ride public transit. The project will develop 393 apartment and condominium units and substantial retail space at the station, and will modernize and improve the existing bus facilities. We have attached our prior letter describing the project, the important benefits of transit-oriented development, and the unique opportunity the County has with this project to implement finally policies encouraging infill development near transit.

The Commission held a public hearing on this project in February and heard testimony from four Del Aire residents, two area realtors, the applicant's representatives, a Metro official, and two developers supportive of transit-oriented development and the project. Despite the limited testimony and correspondence from the community, the Commission requested that the project team and County representatives conduct another meeting in Del Aire to allow for additional public input. The project team and representatives from the Departments of Regional Planning, Public Works, and Fire met in the community in March. This letter provides further information and responds to the concerns expressed at the public hearing and community meeting.

The Project Already Addresses Many of the Residents' Concerns

The Aviation Station project already addresses many of the concerns raised by the community, including the following:

- **The Project Provides Extensive New Landscaping.** The project includes substantial landscaping along West 117th Street and Judah Avenue, including a double row of trees, grass, shrubs, and flowers. The final landscaping plan will be reviewed and approved by the Director.

- **The Project Improves Existing Water Infrastructure.** The project is improving and upsizing existing water infrastructure to serve the project, which should improve current inadequacies in water pressure throughout Del Aire.
- **The Project Limits Signage Interfacing With Del Aire.** The conceptual signage plan for the project depicts a variety of signs designed to complement and contribute to the overall architecture of the project. The majority of these signs will interface with Aviation Boulevard and the transit station, and not the Del Aire neighborhood. In addition, the project includes a condition of approval further limiting the size of the signage facing Del Aire. The final signage plan will be approved by the Director.
- **The Project Will Pay Substantial Fees for Schools, Parks, and Libraries.** The project will pay fees to the Wiseburn School District and the Centinela Valley Union High School District (an estimated total of \$1,039,400). Additionally, the developer has agreed to pay an estimated \$506,000 in supplemental fees into the Wiseburn School District's general fund, thereby affording the District greater flexibility in allocating the funds. The project will also pay an estimated \$714,295 in park fees and \$316,680 in library fees.
- **The Project Assists the County in Meeting Regional Housing Needs.** Infill projects like Aviation Station are necessary to encourage the use of mass transit, reduce vehicle miles traveled by commuters, and thereby reduce air pollution. The applicant has been contacted by numerous developers interested in building this project who all believe there is a strong market for transit-oriented, multi-family housing in this region.
- **The Project Proposes to Include 116th Street Within the County.** The project includes a related application to the Local Agency Formation Commission to place 116th Street within County jurisdiction, which will unify the Del Aire neighborhood under one jurisdiction.
- **The Project Includes a Comprehensive Parking Program.** Some residents mistakenly believe that the project will provide no parking for one bedroom apartments. The project will offer parking to every residential unit and provides more parking than typically provided for transit-oriented projects.
- **The Project Does Not Include Alcoholic Beverage Sales.** The project does not authorize the sale of alcoholic beverages. Any proposal to sell alcoholic beverages would require subsequent County approval.
- **The Project Requested a Change in the Zip Code Status for Del Aire.** The applicant worked with the neighborhood association to collect signatures to petition the United States Postal Service for a change in the zip code status for Del Aire.

The Applicant Proposes New Community Amenities to Address Existing Issues Within Del Aire

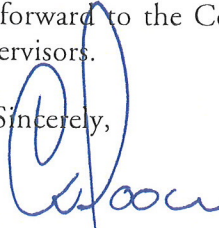
As a result of the community meeting, the applicant is proposing additional amenities to assist the community in addressing existing problems within the neighborhood.

- **The Applicant Proposes to Assist Del Aire in Establishing a Restricted Parking Program.** Residents are frustrated by airport employees utilizing their neighborhood for free parking. The applicant is proposing to assist the community in establishing a parking permit program for Del Aire to prohibit airport employees from parking on the streets of the community.
- **The Applicant Proposes Funding for Additional Street Improvements.** Residents perceive an existing problem with cut-through traffic on Judah Avenue. Although recent traffic counts do not support the residents' perception, the applicant is proposing to provide funding for possible future traffic calming measures and access restrictions. The proposed condition of approval is attached to this letter.
- **The Applicant Proposes Enhanced Landscaping.** While the project already includes significant landscaping along Judah Avenue and West 117th Street, residents requested that the project provide landscaping throughout the Del Aire neighborhood. The applicant is now proposing additional landscaping on Judah Avenue and along the west side of Aviation Boulevard, screening the community from the railroad tracks and Northrop Grumman's industrial facility.
- **The Applicant is Offering the Sheriff's Department Office Space Within the Project.** Residents are worried about the Sheriff's Department's resources for patrolling Del Aire and the current public safety situation within the neighborhood. The project will increase amenities and activity at the Metro station, which will provide more eyes on the street to increase safety. In addition, the applicant is proposing to offer commercial retail space within the project to the County Sheriff for the Department's use and convenience.
- **The Applicant Proposes Additional Recreational Amenities.** In response to requests for recreational amenities useful to the existing Del Aire residents, the applicant is proposing to offer a portion of the retail space within the project for bicycle storage and as a community room that would be available to project residents and the existing Del Aire community.

Regional Planning Commission
April 14, 2011
Page 4

We have appreciated the diligent and careful work of staff throughout this lengthy and comprehensive land use review process. We look forward to the Commission hearing and moving this important project forward to the Board of Supervisors.

Sincerely,



Charles J. Moore

Attachments

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cc: Roger Moliere, Metro
Richard Bruckner
Sorin Alexanian
Sam Dea
Carolina Blengini
Patricia Keane
Steve Burger
Janna Masi



Cox, Castle & Nicholson LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067-3284
P 310.277.4222 F 310.277.7889

Charles J. Moore
310.284.2286
cmoore@coxcastle.com

File No. 56290

February 10, 2011

BY HAND DELIVERY

Regional Planning Commission
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Re: **Transit-Oriented Development at the Metro Green Line Aviation Station;
Regional Planning Commission Hearing Date: February 16, 2011**

Dear Commissioners:

The Aviation Station project is an exciting proposal that will construct at last a transit-oriented development (TOD) within the unincorporated County of Los Angeles.

The project site comprises private and public land at the Metro Green Line Aviation Station, located in the Del Aire community at the intersection of Aviation Boulevard and Imperial Highway near the Los Angeles International Airport (LAX). Seeking to increase ridership on the Green Line, the Los Angeles Metropolitan Transportation Authority (Metro) approached the Kroeze family, the owner of private property and a local business adjacent to the Metro Green Line Aviation Station. Metro proposed a joint development to improve the appearance and experience of the station for transit users and to provide opportunities for new riders with high-density housing located adjacent to transit.

Promoting TOD in Los Angeles is an important goal for most of the region's planning agencies; however, TOD is often stymied by the need for parcel assembly. Parcel shallowness resulting from historical strip commercial zoning makes infeasible retail development and high-density housing necessary for a successful TOD project. This project is possible only because the Kroeze family assembled a city block over the course of 50 years by gradually purchasing the homes surrounding their family business. In 1995, the Metro Green Line opened and the property became ideally located adjacent to a major light rail station. This large assemblage of private property adjacent to transit offers an opportunity very unique in Los Angeles County to redevelop underutilized urban property with a successful, modern TOD project.

TOD projects such as Aviation Station hold the potential to meet many objectives the County is committed to, including increasing the stock of mixed-use infill and workforce housing, mobility, community health and livability, economic development and greenhouse gas emission reductions. Aviation Station is expected to be a revitalizing catalyst project that will spur redevelopment of the Aviation Boulevard corridor.

The design and concept for the Aviation Station project has involved the close cooperation and review of many State and local agencies, County departments, and services providers, including Caltrans, Metro, LAX, the Los Angeles County Local Agency Formation Commission, the Cities of El Segundo, Los Angeles, and Hawthorne, the County Sheriff, Fire, and Public Works Departments, Golden State Water Company, and the Wiseburn School District.

Aviation Station and the Changing Del Aire Community

Aviation Station is located in the unincorporated community of Del Aire—an urban, largely post-World War II neighborhood located near LAX, the Pacific Concourse Industrial Park, the Airport Courthouse, and aviation-related industry located along Aviation Boulevard. Existing infrastructure already serves the property and will be upgraded to assure efficient delivery of water, sewers, and other services.

The area has seen substantial infill development and densification in recent years. Within Del Aire, the Pacific Concourse project approved by the County Board of Supervisors in 2005 was built near the project site at a density of 88 units per acre. Several other high-density housing developments have been approved or constructed in the same area, *e.g.*, Threesixty at The South Bay on El Segundo Boulevard, Fusion at South Bay near Aviation Boulevard and Marine Avenue, and Central Park near the corner of 120th Street and Van Ness Avenue.

Aviation Station is an important stop along the Metro Green Line, and it is the only light rail station providing access to LAX via free shuttle. Aviation Station is planned as a link for the proposed Crenshaw/LAX Transit Corridor Line, a first-phase transit project funded by Measure R. In addition to light rail, Aviation Station is a busy regional bus terminal used by Metro, Santa Monica's Big Blue Bus, Culver CityBus, the Torrance Transit/Municipal Area Express, and the shuttle system to LAX operated by Los Angeles World Airports. Aviation Station connects Del Aire and the surrounding communities to major job centers and regional destinations, and is itself situated proximate to LAX and other significant employment centers.

The private property portion of the project is located adjacent to Aviation Station and is improved currently with the Wild Goose restaurant and bar, an 8-room motel, surface parking, and low-density residential homes developed between the 1930s and 1950s.

The Project Will Redevelop Underutilized Urban Property as Part of a Modern Multimodal TOD Development

The project will be developed jointly by Metro and the Kroeze family. The existing Wild Goose restaurant and bar, motel, low-density housing and existing, inefficient bus facilities and surface parking will be demolished. The project will redevelop the private and public land with 29,500 square feet of retail, 390 multi-family residential units, and a new pedestrian-friendly transit plaza to connect the neighborhood to the station. The project will also construct a new, modernized bus terminal in a more appropriate location adjacent to Aviation Boulevard, directly to the north of the project site, and will reconfigure parking at the existing Park and Ride lot.

The project is designed to establish transit and pedestrian-supportive development, improve public safety and pedestrian access to transit facilities, create new economic and housing

opportunities, and reduce congestion and greenhouse emissions by decreasing vehicle miles traveled and inviting pedestrian access. For development to be transit-oriented, it needs to be more than just adjacent to transit. Development generally needs to be shaped by transit in terms of parking, density, and building orientation in comparison to conventional development for it to be considered transit-oriented. A successful TOD will reinforce both the community and the transit system. Accordingly, the proposed development relates to the station along at its northern elevation, relates to the busy Aviation Boulevard corridor at its western elevation, and steps down to two-story townhomes at the two elevations interfacing with the residential Del Aire neighborhood.

One of the challenges facing Aviation Station is that the platform is elevated, isolated, and does not connect visually to its surroundings. The elevated station platform poses difficulties for access, safety, and creating a sense of neighborhood character. To maximize the potential and place-making qualities of the station, the project design integrates the station with the community, connecting it to the neighboring residences and industrial employment centers and creating usable, pedestrian friendly space and character. The proposed retail uses will be connected visually to the station and will benefit both the community and transit users. In addition, the free airport shuttle will provide opportunities for airport users to use Aviation Station as an extension of the terminal and will provide essential services lacking at the airport. Vehicular traffic and the improved bus terminal will also provide important opportunities for intermodal connectivity.

To increase ridership potential, Metro requires services for transit-users, increased accessibility to the station, and an aesthetically appealing environment to draw people to the station. The project is designed to capture vehicular traffic, to improve the pedestrian experience, and to create a pleasant and safe environment that will encourage people to use the station and transit. Landscaping, architecture and signage will provide a sense of place and community identity.

Aviation Station Implements Important Policies the County Has Promoted for Many Years

From the adoption of the Transit Oriented Districts Ordinance, the Mixed-Use Ordinance, and important policies within the adopted Housing Element to the proposed East LA 3rd Street Specific Plan and Healthy Design Ordinance, the County has consistently attempted to establish TOD as an important component of the overall development pattern to manage the planned growth of the region. The County's efforts have only intensified since California passed significant legislation to reduce greenhouse gas emissions and to promote land use growth patterns that will reduce driving and vehicle miles traveled, *i.e.*, AB 32 and SB 375.

Current County Zoning Regulations Do Not Foster TOD Development

Despite diligent efforts at advanced planning, development within County transit-oriented districts has languished for a decade and current zoning regulations are still not appropriate for modern, urban infill, TOD projects. For example, Aviation Station is a prominent station and an important intermodal transit hub for LAX, yet it is not included within a transit-oriented district. In addition, current parking requirements do not allow the flexibility necessary for transit-oriented projects and current density limitations do not acknowledge the urgent need for high-density development near public transit stations.

The Mixed Use Development Zone Provides the Flexibility Necessary
to Build a Successful TOD Project

The underutilized Mixed Use Development zone is the best available mechanism to allow for the development of the project, without the need for variances from the zoning regulations, ahead of any County plans to modernize the zoning regulations. Planning staff selected the Mixed Use Development zone specifically because it provides the flexibility necessary for the ultimate builder or builders to construct the project, but still requires the Planning Director to approve any design changes to assure quality development through the conditional use permit.

However, planning staff proposes to apply also the Development Program combining zone to the property. The Development Program combining zone requires the project to conform to specified plans and exhibits and eliminates the flexibility provided by the Mixed Use Development zone. With the Development Program combining zone, changes in project design require Commission approval of a new conditional use permit and tentative map. However, a builder should be able to accomplish design changes without the need for a new conditional use permit.

In essence, the Mixed Use Development zone properly provides design flexibility by authorizing the Planning Director to approve subsequent, revised site plans, but the Development Program combining zone inappropriately requires the Commission to review a new conditional use permit for the same design changes. The Development Program combining zone is incompatible with the Mixed Use Development zone and should be eliminated.

TOD is Critical For Achieving the State's and the County's Emissions Reduction Targets

Household transportation is the single-largest and fastest-growing source of global warming pollution in the state. Locating housing closer to jobs and transportation choices and creating walkable communities reduces commute times and can cut millions of tons of global warming pollution, while improving quality of life. California households could reduce their transportation-related climate pollution by 30% or more from reduced fuel use alone if development patterns between now and 2020, both inside and outside of the urban core, were more efficient. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009)

If most of California's growth continues to follow typical sprawl development patterns, the result will be higher costs of local services, continued loss of farmland and open space, and increased dependence on automobiles. Consequently, the total number of annual vehicle miles traveled in California is expected to increase from 296 billion miles in 2000 to 400 billion miles by 2020, a 33% increase. (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002) Even with much greater fuel efficiency and low-carbon fuels, California will not be able to achieve its climate goals unless it can reduce the rate of growth in vehicle miles traveled. (A Guide to California's SB 375, Natural Resources Defense Council, June 2009).

TOD Benefits Individuals, Communities, Regions and the State

Nearly a decade ago, Caltrans conducted a study on the factors for successful TOD in California, and cited numerous benefits of TOD (Statewide Transit-Oriented Development Study: Factors for Success in California, CalTrans, 2002):

- **TOD provides mobility choices.** By creating activity nodes linked by transit, TOD provides important mobility options that are very much needed in congested metropolitan areas. This also allows young people, the elderly, people who prefer not to drive, and those who do not own cars the ability to get around.
- **TOD increases public safety.** By creating active places that are busy through the day and evening, and providing “eyes on the street,” TOD helps increase safety for pedestrians, transit-users, residents, and businesses.
- **TOD increases transit ridership.** TOD improves the efficiency and effectiveness of transit service investments by increasing the use of transit by 20% to 40%.
- **TOD reduces rates of vehicle miles traveled.** Vehicle travel in California has increased faster than the state’s population for years. TOD can lower annual household rates of driving by 20% to 40% for those living, working, and shopping near transit stations.
- **TOD increases households’ disposable income.** Housing and transportation are the first and second largest household expenses, respectively. TOD can free-up disposable income by reducing driving costs, saving an estimated \$3,000 to \$4,000 per year for each household.
- **TOD reduces air pollution and energy consumption rates.** By providing safe and easy pedestrian access to transit, TOD lowers rates of air pollution and energy consumption. Also, TODs reduce rates of greenhouse gas emissions by 2.5 to 3.7 tons per year for each household.
- **TOD conserves resource lands and open space.** Because TOD consumes less land than low-density, auto-oriented growth, it reduces the need to convert farmland and open spaces to development.
- **TOD promotes economic development.** TOD is increasingly used as a tool to help revitalize declining urban neighborhoods and to enhance tax revenues for local jurisdictions.
- **TOD decreases infrastructure costs.** Depending on local circumstances, TOD can help reduce overall infrastructure costs for expanding water, sewage, and roads to local governments by up to 25% through more compact and infill development.
- **TOD promotes affordable and work-force housing.** TOD increases the stock of lower-cost housing and reduces household transportation expenditures, thereby increasing disposable income available to cover housing costs. Housing costs for land and structures can be significantly reduced through more compact growth patterns.

The Current Market Favors TOD and Multi-Family Infill Housing

Several broad demographic trends influencing California's future are expected to contribute favorably to the market demand for TODs. For housing, these trends not only include unprecedented population and household growth, but a shortfall in housing production and a significant need for housing that is affordable to many households in California. Former homeowners who lost their properties to foreclosure are now pouring into the rental market. Meanwhile, tightened credit standards are making it tougher for potential buyers to qualify for a home loan, despite very low interest rates. Compounding the demand for rental housing, Gen-Yers are less interested in home ownership and are unwilling to sign up for the long commutes that their parents lived with.

Los Angeles County is expected to be a renters' market for some time to come, and this project fulfills an important need for multi-family, workforce housing located adjacent to transit and near major employment centers.

We appreciate greatly the diligent work of planning staff and the other County departments and agencies to help form this important TOD project. The project team looks forward to presenting the project to the Commission and answering any questions that you may have.

Sincerely,



Charles J. Moore

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cc: Roger Moliere, Metro
Richard Bruckner
Sorin Alexanian
Sam Dea
Carolina Blengini
Patricia Keane
Steve Burger
Janna Masi

Proposed Condition of Approval

The permittee offered to provide \$300,000 for community circulation improvements in proximity to the Project Site, including, but not limited to 117th Street and Judah Avenue. A dedicated interest-bearing fund or other similar deposit methods shall be established to the satisfaction of the Department Public Works and Department of Regional Planning prior to final map approval for Tentative Tract Map No. 070853. The usage of the fund shall be subject to the following guidelines:

- a. The president of the Del Aire Neighborhood Association (Association) shall submit a request in writing to the Director of Regional Planning within two (2) years of the issuance of a certificate of occupancy for the Project for expenditure of funds for circulation improvements within the Del Aire Community. The request shall indicate the types and locations of the improvement.
- b. If no written request has been submitted by the president of the Association as mentioned-above the permittee may request in writing a refund of the deposit. If building permits have not been issued and construction of the Project has not commenced, the request shall be accompanied by an application for reversion of acreage pursuant to Title 21 and the Subdivision Map Act and all monies deposited by the permittee, including any interest, pursuant to this condition shall be returned to the permittee upon recordation of the final map for the reversion to acreage.
- c. The fund shall be for the sole purpose of providing road improvements for streets within the Del Aire Community which include, but not limited to the following: parkway/median and sidewalk improvements, landscaping public right-of-ways, curb pop-outs; special signage; creation and/or implementation of parking restrictions; and circulation restrictions such as turn prohibitions, truck access prohibitions and striping. The community circulation improvements will only be constructed within the public right-of-way and will otherwise not require construction or modification of existing improvements on private property.
- d. The requested improvements and the uses of the fund shall be to the satisfaction of the Department of Public Works and other responsible agencies having jurisdictional authority over the specific improvement.